

12M705

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

ZENA WALAKAI,

Defendant.

PRE-ARRAIGNMENT

C O M P L A I N T

(21 U.S.C. §§ 952(a)
and 960)

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

EDWARD RAPP, being duly sworn, deposes and states that he is a Task Force Officer with the Drug Enforcement Administration ("DEA"), duly appointed according to law and acting as such.

Upon information and belief, on or about July 27, 2012, with in the Eastern District of New York and elsewhere, defendant ZENA WALAKAI did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


1. On July 27, 2012, defendant ZENA WALAKAI arrived at John F. Kennedy International Airport in Queens, New York, aboard British Airways flight number 183 from Tanzania via London, United Kingdom.

2. WALAKAI was selected for a Customs examination. WALAKAI was in possession of one carry-on handbag and one checked bag. A Customs and Border Protection ("CBP") officer asked WALAKAI if both bags were hers, and she confirmed that they were. The inspection of WALAKAI's carry-on handbag revealed 18 pellets, covered in feces, one of which subsequently field-tested positive for the presence of heroin. A pat down search was then conducted in a private search room with negative results. During questioning, WALAKAI voluntarily admitted to ingesting foreign bodies. WALAKAI was presented with an x-ray consent form, which she read, appeared to understand, and voluntarily signed.

3. The defendant WALAKAI was transported to the medical facility at John F. Kennedy International Airport. At the medical facility, WALAKAI asked to use the bathroom, whereupon she passed 13 pellets. WALAKAI was then placed under arrest. A subsequent x-ray read positive for foreign bodies in the defendant's intestinal track.

6. Defendant WALAKAI will be detained at the JFK medical facility until such time as she has passed all the pellets contained within her intestinal tract.

WHEREFORE, your deponent respectfully requests that
defendant ZENA WALAKAI be dealt with according to law.



EDWARD RAPP
Task Force Officer
Drug Enforcement Administration

Sworn to before me this
28th day of July, 2012



UNITED :
EASTERN

5/60

DGE
K